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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION
11

12 AMBASSADOR MARC GINSBERG and) CASE NO.: 5:21-CV-00570-BLF
13 COALITION FOR A SAFER WEB,)
14 Plaintiffs,) **JOINT STIPULATION AND**
15 v.) **[PROPOSED] ORDER TO STAY**
16 GOOGLE INC.,) **DISCOVERY AND CONTINUE**
17 Defendant.) **OTHER DATES**
18)
19 _____)

Judge Beth Labson Freeman

JOINT STIPULATION

Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, “Plaintiffs”), and Defendant Google LLC, erroneously sued as Google Inc. (“Google”), jointly submit this Stipulation to temporarily stay discovery and to continue other dates:

WHEREAS, Plaintiffs filed their complaint on January 25, 2021;

WHEREAS, the initial case management conference is currently scheduled for May 20, 2021 at 11:00 a.m., with the joint case management statement due on May 13, 2021;

WHEREAS, Google has filed a motion to dismiss the complaint (ECF 14);

9 WHEREAS, Google's motion to dismiss seeks to dismiss the complaint in its entirety,
10 thereby obviating the need for discovery or any further proceedings in this case;

WHEREAS, the parties agree that it will be most efficient, convenient, and economical for both the Court and the parties to stay discovery and continue other initial dates or deadlines until the Court has ruled on Google’s motion to dismiss and the scope of the pleadings is settled;

14 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval,
15 to the following:

1. All discovery (including, but not limited to, disclosures under Rule 26) shall be stayed for 120 days as of the filing of this Stipulation with an option to extend by mutual agreement.
 2. The initial case management conference shall be continued to 30 days after the Court rules on Google's motion to dismiss, or such other date established by the Court.
 3. The deadline for the case management statement shall be continued to 7 days prior to the postponed initial case management conference, or such other date established by the Court.
 4. The parties acknowledge that the stay and extension of deadlines will also extend the deadline for the ADR certification and other steps in the mandatory ADR process.

5. The deadline for Plaintiffs to submit their opposition to Google's motion to dismiss shall be extended by 30 days, from May 6, 2021 to June 7, 2021. Google's reply deadline shall be extended by 30 days, from May 13, 2021 to July 14, 2021.

The parties reserve all of their rights and defenses, including the right to move for a longer stay and/or oppose such motion, and nothing in this Stipulation shall be construed as a waiver thereof.

Respectfully submitted

Dated: April 26, 2021

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Lauren Gallo White
Lauren Gallo White
lwhite@wsgr.com

Attorneys for Defendant
GOOGLE LLC

Dated: April 26, 2021

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Keith Altman
Keith Altman
kaltman@lawam

Attorneys for Plaintiffs
AMBASSADOR MARC GINSBERG and
COALITION FOR A SAFER WEB

SIGNATURE ATTESTATION

I, Lauren Gallo White, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing of this e-filed document.

By: /s/ Lauren Gallo White
Lauren Gallo White

1 [PROPOSED] ORDER
2 PURSUANT TO STIPULATION, IT IS SO ORDERED
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4 Dated: _____
5 Honorable Beth Labson Freeman
6 United States District Court Judge
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